



Business and Industry Association
New Hampshire's State Chamber of Commerce

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September 1, 2010

Debra A. Howland
Executive Director
NH Public Utilities Commission
21 South Fruit St.
Concord NH 03301

Re: Comments of the Business and Industry Association of New Hampshire on DE 10-212, establishing a commercial and industrial renewable energy rebate program

Executive Director Howland:

Thank you for the opportunity to comment on DE 10-212. The Business and Industry Association of New Hampshire (BIA) is a not for profit business association, which advocates for policies that promote and preserve the economic well being of the state. The BIA's membership is composed of over 400 businesses throughout the state. These businesses vary in size and represent all segments of the commercial and industrial sectors.

The BIA is supportive of the creation of a commercial and industrial renewable energy rebate program, which will enable the non-residential sector to access the Renewable Energy Fund (REF). However, we are concerned how the proposed rebate program will impact the Public Utilities Commission's (Commission) ability to effectively issue a request for proposal (RFP) by March 1, 2011, as was mandated by the legislature with the passage of HB 1270. Given the limited funds in the REF and fact that to date 100% of the REF's outlays have been to small-scale, residential installations, as mandated by RSA 362-F:10, V, we are concerned with the financial viability of both a rebate program and an RFP.

We strongly believe that all ratepayer classes, sectors, and technologies must be given equal opportunity to participate in the REF, based on the amount that the residential and nonresidential sectors each pay into the fund, in order for the fund to achieve the goals laid out in the purpose statement of RSA 362-F:

362-F:1 Purpose. – Renewable energy generation technologies can provide fuel diversity to the state and New England generation supply through use of local renewable fuels and resources that serve to displace and thereby lower regional dependence on fossil fuels. This has the potential to lower and stabilize future energy costs by reducing exposure to rising and volatile fossil fuel prices. The use of renewable energy technologies and fuels can also help to keep energy and investment dollars in the state to benefit our own economy. In addition, employing low emission forms of such technologies can reduce the amount of greenhouse gases, nitrogen oxides, and particulate matter emissions


transported into New Hampshire and also generated in the state, thereby improving air quality and public health, and mitigating against the risks of climate change.

Furthermore, we believe that in order for the REF to achieve the previously mentioned goals, incentive / grant programs must be fuel and technology neutral. We applaud the staff's diligent work in preparing the "straw man" proposal, and the recommendation memo. However, we believe that when the Commission picks winner and losers among the various renewable technologies in the marketplace, there is a risk of stifling innovation and forcing facilities to consider more costly, inefficient options. While solar electric photovoltaic arrays and solar water heating systems should be a part of any incentive / grant program, we fear that limiting a program to just these two technologies ignores many of New Hampshire natural assets.

Enacting technology blind, fuel neutral incentive / grant programs is required to have a transformative program that spurs development and fosters innovation. We fear that singling out such a narrow field of technologies will serve to freeze the marketplace and prevent many equally valuable, and potentially even more cost-effective, projects from coming to fruition.

We urge you to fully consider the impact that a rebate program would have on the RFP, which, per legislative mandate, must be issued by March 1, 2011. Furthermore, should the Commission determine that the rebate program will not be a detriment to the mandated RFP, consider expanding the spectrum of fuels and technologies eligible for funding under this proposal.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael Licata", written in a cursive style.

Michael Licata
Director of Government Affairs